ATTACHMENT 7

AT&T UNE-P METHOD	SWBT DESCRIBED VARIATION	SAGE/ NAVIGATOR METHOD	POST REMOVAL OF ADDRESS REQUIREMENTS FOR CONVERSIONS
Step 1: Launch TN-driven DataGate service address validation request Step 2: Select service address with working status indicator among several addresses returned via DataGate Step 3: Auto-populate address in some combination of up to 12 service address related fields using internally developed parsing logic Step 4: Manual inspection of address as parsed, with manual corrections as necessary Step 5: Submit LSR	Step 1: Launch query and retrieve CSR for customer service address Step 2: Create manual record of service address from CSR Step 3: Manually enter service address from CSR into DataGate service validation query Step 4: Manually record service address returned from validation query. Step 5: CLEC service representative parses address and manually re-enters validated service address into separate address fields. Step 6: Submit LSR[1]	Step 1: Launch query and retrieve CSR for customer service address Step 2: Auto-populate CSR address on LSR without performing address validation Step 3: Submit LSR	*As of May 27, 2000, no service address will be required on a conversion. Service address will still be required on other order activity, for example, migrate plus new connect.*

[1] Auto-populating the CSR address into the DataGate service address validation query and then applying a CLEC-developed parsing routine to correctly auto-populate the output (i.e. address returned via the address validation query) into the LSR order fields is a complex task. SWBT does not indicate that any CLEC has been able to accomplish this

PROCESSING ISSUES			
Service address that is returned as validated may nonetheless fail downstream edits. LSR may contain a "valid" address per PREMIS, but nonetheless be deemed incomplete or inaccurate when compared to back end CRIS records. Parsing continues to be a problem and will continue to be an issue on any order activity requiring service address.[2]		SWBT DataGate Technical Reference mandates use of address validation process prior to LSR submission. Orders can still reject for invalid address when service orders edited against PREMIS record image based edits at SORD. Posting problems can occur due to use of invalid address. No CSR address available on new connects.	Discrepancy between address in CSR and address in PREMIS will result in manual fallout and additional intervention at SWBT's end. Reject will not be returned, but electronic flow through is impacted and increased LSC resources presumably will be necessary for additional error resolution. SWBT has not proposed any inbound edit to detect mismatch between TN and customer. This partial validation to prevent slamming is implemented today in Pacific Bell EDI development.

development. Before integrating pre-ordering and ordering functions, the CLEC first would be required to integrate multiple pre-order functions (i.e. retrieval of CSR and auto-population into an address validation query).

[2] SWBT has identified no CLEC that has successfully integrated the DataGate service address validation pre-ordering function with the EDI ordering function. No live commercial activity of any volume has been reported by SWBT for EDI/CORBA pre-order.

ATTACHMENT 8

From: Dalton, Nancy M, NLSSS
> > Sent: Wednesday, February 23, 2000 1:17 PM
> > To: 'dy5499@txmail.sbc.com'
> > Cc: Chambers, Julie S, NLSSS; Hall, Lori L, NLSSS; Asbury, Sandra J,
> > NLSSS
> > Subject: Issues Meeting Topics
> >
> > Dave;
> >
> > I spoke with Brenda Grant and Sandy this morning and asked that we shift
> > our focus from trying to get us all together for a social meet and greet
> > type meeting to introduce us to new account team members to one that is
> > sooner rather than later to discuss the issues that I mentioned in my
> > February 9th e-mail. With calendars being what they are, a conference
> > call will suffice. Following are the topics that we would like to
> > discuss:
> >
> > 1. EDI Volume Processing. In your February 16th reply to my e-mail,
> you
> > stated that the current constraint issue is unrelated to the situation
> we
> > experienced with queuing in July due to the fact that the July situation
> > was such that AT&T sent large volumes of orders packaged individually,
> one
> > per file. You also stated that SWBT modified its handling of AT&T's
> > orders to compensate for the additional overhead involved with the
> > individual files. The issue does in fact appear to be the same. We are
> > still today and have been continuously packaging files individually,
> i.e.,
> > one order per file. As I'm sure you can see via the reject volumes, we
> > have expereienced rejects due to invalid due date reasons and as a
> result
> > of that and other factors, we inserted an edit to validate due dates
> prior
> > to releasing orders. We simply released the orders one right after
> > another as we had done previously. SWBT advised AT&T that upon receipt,
> > SWBT was on its end batching orders onto a single file (e.g., 2000 files
> > per hour) for processing. SWBT suggested a limitation of 500 AT&T
> > transactions per hour to be included on the file in order to allow for
> > other CLEC orders to make it onto the file and not have to wait for the
> > entire file to be processed to completion. Prior to this, we had
> > understood the process to be as you described in your e-mail in that
> SWBT
> > would process each transaction individually in real time upon receipt
> and
> > did not realize that SWBT was actually batching transactions onto a

> file.
> > We remain concerned about the process and do not understand the 500
> > recommendation, 25% of the 2000 capacity, when AT&T makes up more than
> 75%
> > of the EDI transactions sent today. Can we discuss this further seeing
> as
> > we haven't changed anything about the way we are sending transactions
> and
> > why the July issue seems to be an issue yet again.
> >
> > 2. Multi-line orders. We do not understand the requirement to match
> SWBT
> > account structures when migrating a UNE customer with multiple lines.
> We
> > lost the "migrate as is" debates through the arbitration processes and
> > have met the "as specified" requirements. It does not seem appropriate
> > that we have to send 2 orders or require the customer to contact SWBT
> > during the negotiations process to have their account combined into 1 if
> 2
> > lines are billed separately by SWBT retail if we are planning to offer
> the
> > customer the 2 lines on one bill.
> >
> > 3. Routing of intraLATA traffic in a UNE-P environment. This is the
> > issue that Julie Chambers referred to you via an e-mail on February 3.
> In
> > light of the IP Communications decision and the fact that SWBT has
> already
> > demonstrated in production with AT&T that it can complete intraLATA toll
> > calls via its network for AT&T UNE-P customers that we should have the
> > option to utilize SWBT's common transport network for the routing of
> such
> > in TX.
> >
> > 4. We continue to experience high volumes of rejects as a result of
> > address parsing and editing issues. Unlike Pacific, Datagate does not
> > return parsed addresses and we do not have specific mapping requirements
> > to address the myriad of parsing issues that we have experienced. We
> have
> > also looked at SWBT CSRs and if such were the source of address
> validation
> > information, the same issues would exist. Is there a set of
> requirements
> > that SWBT can provide to AT&T for parsing? Bill Frost had previously
> > asked for the requirements utilized by SWBT to parse the address it
> > obtains from Datagate prior to CLEC return via EDI CORBA and he was

> > refused. This has also been discussed at Change Management without
> > resolution. It would seem that if SWBT has built the EDI CORBA
> capability
> > to parse the addresses it could make such logic and/or requirements
> > available.
> >
> > 5. Billing Issue - Access Recovery. We have asked that the settlement
> > for the access issue that we experienced whereby SWBT billed the
> companies
> > as opposed to providing AT&T with its records to do so include a generic
> > timeline for future use. We have been refused this request and it was
> > explained that every situation is different. Although I do not disagree
> > that root causes may be different, I would think that a recovery process
> > could be generic and am concerned about the lack of a commitment to a
> > recovery timeline. Based on our most recent experience, we were told
> that
> > it would take an indefinite period of time to recreate and provide the
> > records for corrective billing because SWBT did not have the resources
> > committed to do so. As a result, we feel that a commitment in advance
> is
> > necessary to govern any future issues.
> >
> > 6. Billing Issue - Duplicate billing for Operator Services Rater and
> > Branding via SWBT's 11/5/99 bill (paper bill for 214-M01-3003-510-5).
> We
> > have been charged $25,500 for INITIAL LOAD CHARGES when in fact we had
> > previously paid the initial load charges and should not have to pay them
> > again per the TX contract section 5.2.3.3. We would like to discuss
> > reimbursement of this amount that AT&T paid to SWBT upon receipt of the
> > bill which SWBT claims was for March charges.
> >
> > I am hopeful that we will find 60 to 90 minutes in the next week or so
> to
> > discuss these and any other issues that need attention.
> >
> > Thanks.
> >
> > Nancy

ATTACHMENT 9

From:	Willard, Walter W (Walt), NCAM [wwillard@ems.att.com]
Sent:	Wednesday, April 12, 2000 5:26 PM
To:	BANNECKER, BOB G (SWBT)
Cc:	Chambers, Julie S, NLSSS; Deyoung, Sarah, NCAM; Hall, Lori L, NLSSS; 'Paul O'Sullivar
Subject:	RE: CLECSS00-051 - Address Validation

Bob,

AT&T supports the concept of removing the service address requirement for UNE conversion activity, but has some reservations based on the requirements as published in SWBT's Accessible Letters CLECSS00-008,CLECSS00-040, CLECSS00-051 and CLECSS00-058. First, AT&T is concerned that SWBT's published requirements do not provide an option whereby a service address, if submitted, would be checked against the submitted telephone number in order to detect a potential customer mismatch. The method used by Pacific Bell, whereby the service address that a CLEC submits is not used to process the service request, but is partially validated against the TN, provides a protection against unintentional slamming that is not provided in SWBT's proposed requirements. Is SWBT willing to consider adding the Pacific Bell partial validation process?

Second, we need to understand what process SWBT will follow when its downstream systems discover that the address retrieved internally from the CSR and the address as it exists in PREMIS do not match. How often does SWBT expect this will occur? What will be the impact on provisioning and billing? Will the CLEC be aware of the problem?

Third, we need to ensure that there is an adequate opportunity for testing of this release to determine whether it is functioning properly. In connection with the joint testing of this release, can SWBT take the test orders all the way through to posting? Short of that, as we have previously discussed, thorough testing cannot be accomplished until SWBT implements this release in the production environment. In addition, because of the lack of standard lead time between the announcement of the release and its introduction, AT&T will have to conduct simulation testing because it will not have yet done the internal development work necessary to implement the release end-to-end.

In light of our concern that the elimination of the service address requirement not be delayed any further, AT&T withdraws its objection to the change, but requests that the issues raised in this e-mail be addressed expeditiously.

Thanks,

ATTACHMENT 10

Date Time	Tele # Rptd	Order	R.O.	Trouble Referred by AT&T	VER Code / Test	Disposition & Close Narrative	Dept. Resolved
8/9/99 8:50am	940 692-5043	C654062	D654061 N654063	TA:HOOL while on the line cust hears X-talk	21 / Hard Gnd	0432- ready access terminal buried	OSP
8/9/99 10:17am	409 275-5832	Resale	No conv	TA: NDT when phone rings cuts off	no test results	0430-resplice cable	OSP
8/8/99 11:23am	281 353-8750	C296884	D296883 N296885	TA: NDT dispatch authorized	42 / Open in Cable	0431-resplice pair 492	OSP
8/12/99 9:11am	409 865-5986	B4 Conv		TA:MISC cust cut line/has static on line	Short	0383 - repaired drop wire	OSP
08/17/1999 12:04pm	409 865-5986	C296787	D296786 N296788	TA: NDT at Network Interface (this is a move order with NFW)	41 / open out	0430 - resplice cable	OSP
08/16/1999 6:54pm	281 997-3697	C278518	D278517 N278519	TA: NDT (address on C different from address on D/suspect rpm had wkd bk)	41 open out	0420 -came clear in cable	OSP
08/17/99 11:27am	817 428-2883	C653927	D653926 N653928	NDT dispatch auth (this is a move and conversion with field work/Mrs says did not know about the order?)	61 / Line in Use	0385 - Placed temp drop	OSP
8/18/99 1:51pm	817 428-2883			NDT call when complete	55 /	1313-closed by repairman with no narrative???	OSP
08/17/99 12:41pm	409 983-4603	C295963	D295962 N295964	NDT (this is a move and the service orders were cancelled on the DD)	45 / open out	0960 - found OK 8/17@413pm	OSP
08/17/99 1:40pm	806 669-7480	C772648	D772646 N772649	NDT	75 / short	0431 - resplice pair	OSP
	409 283-8339	C279060	D279059 N279061	NO Trouble History??			
				(D order had Apt 182 / C order had Apt 148)			

Date Time	Tele # Rptd	Order	R.O.	Trouble Referred by AT&T	VER Code / Test	Disposition & Close Narrative	Dept. Resolved
				(C order had field work because had to come off of IPG on to copper cable pair)			
8/17/99 5:38pm	713 733-7415	C289915	D289913 N289913	TA:NDT cant receive or make calls(converted to UNE on 8/17 C&D had different address a move 2 additional C orders issued to work back to old address)		1235- billed $30 MSC	OSP
8/20/99 11:47am	713 733-7415	C008874	C008875	NDT SWB tech told cust SWB ca burned unable to say where/adv'd TOK demands DPO	TOK	1308 - (no narrative)	OSP
8/20/99 3:41pm	713 733-7415			NDT c289915 cd8/17 TOK thinks drop has been burnt/dispatch auth	TOK	1308 - Per Carolyn @AT&T end user DNP	OSP
				(C order had LOC APT=3 and D order had Unit=3 which changed facilities)			
						(had to DPI 3 times)	
8/18/99 10:15am	210 530-0766	C767498	D767497 N767499	NDT - unable to test dispatch auth (this is a move and the new address did not have field work but needed a drop?)		0375 - wire from protector to dmark	NOC
8/18/99 11:10am	915 520-5134	C753992	D753991 N753993	CCO to 9153334351 GROL must dial 1 or 0	TOK	NTF in TXC per routing cust calling from Midland to Odessa is LD	NOC
8/18/99 3:33pm	713 455-7118	C296887	D296886 N296888	NDT test open out balanced(C order had LOC Apt=210 D order had Apt=2211)	41 / open out	0430 - respliced pair	OSP
8/18/99 11:48am	903 938-8036	Resale	No conv	TA:NSY 1st was buzzing,then clicking, then cuts off conversation	cross to wkg pair	0416 - conductor defective pair left maintenance	OSP
8/18/99 12:03pm	915 751-4502	C757084	D757083 N757085 DD 8/17	NDT test short and ground	17 / sht & gnd	0432 - buried cable repaired	OSP
8/17/99 9:30am	*210 646-8713*	C772465	D772463 N772467	TA:NDT	no test	0750 - retest ok per AT&T cancel report (@3:56pm)	

Date Time	Tele # Rptd	Order	R.O.	Trouble Referred by AT&T	VER Code / Test	Disposition & Close Narrative	Dept. Resolved
8/18/99 7:49pm	806 746-5410	C7645410	D764482 N764484	NDT N764484 cd 8/17 test open out DPO per Isabel	41 / open out	0374 - Repaired at the NI	OSP
8/19/99 11:35am	361 287-3535	C764432	D764430 N764433	CBC gets fast busy actual address is 324 n 5th	11 / cross to wkg pair	0401 performed LST	OSP
8/19/99 3:05pm	956 748-3785	Resale	No conv	CBC gets busy dispatch per Adriana	61 /	0401 opn made LST	OSP
8/20/99 12:16pm	409 753-2185	C296915 was cancelled by James Gish	D296914 N296916 was not cancelled	NDT test intercept dispatch auth	SU / intercept	0901- TWA/MR TWD/same bpc/no dbc (I have no idea what this says)	OSP
8/19/99 7:40pm	915 363-0483	C777270	D777269 N777271	NDT	75 / short	0730 retest ok by repairman b4 dispatched	OSP

Common trouble for UNE Combo Conversions

Blue Controversy in the address on the D and C orders.

Black Business as usual.

ATTACHMENT 11

From: Chambers, Julie S, NLSSS
Sent: Thursday, April 13, 2000 8:40 PM
To: Dave Young - SWBT
Cc: Deyoung, Sarah, NCAM
Subject: AT&T request
Importance: High

Dave -

I am writing in response to SWBT's offer to fund a consulting engagement of up to 80 hours per CLEC with GE Global Exchange Services (formerly, GEIS). Given the difficulties that AT&T previously has described to SWBT concerning the ability to integrate pre-ordering (DataGate) and EDI ordering functions without access to essential technical resources, such as parsing conventions, AT&T is interested in the additional technical support being offered. Please let me know the earliest available date that AT&T can schedule with GEIS to begin the consultation. I assume that the terms of your arrangement with GEIS provide that any CLEC proprietary information to which GEIS is given access in the course of the engagement will not be shared, but I would appreciate confirmation of that point. Thanks, Dave.

Julie

Julie S. Chambers
jschambers@ATT.com <mailto:jschambers@ATT.com>
(972)778-5584

ATTACHMENT 12

Carrier to Carrier
Performance Standards and Reports
Interim Guidelines February 2000
Bell Atlantic - New York State

CLEC Aggregate Performance
ORDERING - RESALE POTS / SPECIAL SERVICES

Metric #		Standard	CLEC Aggregate Performance	CLEC Aggregate Observations
	RESALE Pre-Ordering			
	PO-3 - Contact Center Availability			
PO-3-01	Average Speed of Answering – Ordering		16.40	
PO-3-02	% Answered within 30 Seconds – Ordering	80% within 30 Seconds	88.82	13270
PO-3-03	Average Speed of Answering – Repair		43.07	
PO-3-04	% Answered within 30 Seconds – Repair	80% within 30 Seconds	63.68	79551
	POTS & Pre-qualified Complex - Electronically Submitted			
	OR-1 - Order Confirmation Timeliness			
OR-1-01	Average Local Service Request Confirmation (LSRC) Time (Flow Through)		0.71	
OR-1-02	% On Time LSRC – Flow Through	95% within 2 Hours	95.48	13849
OR-1-03	Average LSRC Time < 10 Lines		8.71	
OR-1-04	% On Time LSRC < 10 Lines	95% within 24 Hours	95.60	11741
OR-1-05	Average LSRC Time >= 10 Lines		24.36	
OR-1-06	% On Time LSRC >= 10 Lines	95% within 72 Hours	100.00	3
	OR-2 - Reject Timeliness			
OR-2-01	Average Local Service Request (LSR) Reject - Time (Flow Through)		0.38	
OR-2-02	% On Time LSR Reject – Flow Through	95% within 2 Hours	95.47	10008
OR-2-03	Average LSR Reject Time < 10 Lines		8.58	
OR-2-04	% On Time LSR Reject < 10 Lines	95% within 24 Hours	95.21	6209
OR-2-05	Average LSR Reject Time >= 10 Lines		33.76	
OR-2-06	% On Time LSR Reject >= 10 Lines	95% within 72 Hours	100.00	2
	Complex Services - Electronically Submitted			
	OR-1 - Order Confirmation Timeliness			
OR-1-03	Average LSRC Time < 10 Lines		UD	
OR-1-04	% On Time LSRC < 10 Lines	95% within 72 Hours	UD	
OR-1-05	Average LSRC Time >= 10 Lines		UD	
OR-1-06	% On Time LSRC >= 10 Lines	95% within 72 Hours	UD	
	OR-2 - Reject Timeliness - Requiring Loop Qualification			
OR-2-03	Average LSR Reject Time < 10 Lines		UD	
OR-2-04	% On Time LSR Reject < 10 Lines	95% within 72 Hours	UD	
OR-2-05	Average LSR Reject Time >= 10 Lines		UD	
OR-2-06	% On Time LSR Reject >= 10 Lines	95% within 72 Hours	UD	
	POTS / Special Services - Aggregate			
	OR-3 - Percent Rejects			
OR-3-01	% Rejects	No Standard	46.21	35122
	OR-4 - Timeliness of Completion Notification			
OR-4-01	Completion Notice – Average Response Time		0.04	
OR-4-02	Completion Notice – % On Time	95% by next bus. day at noon	99.09	20944
OR-4-03	% Orders Excluded from % On Time Measurement	95% by next bus. day at noon	UD	
OR-4-04	Work Completion Notice – Average Response Time		0.00	
OR-4-05	Work Completion Notice – % On Time	95% by next bus. day at noon	100.00	20907
	OR-5 - Percent Flow-Through			
OR-5-01	% Flow Through - Total	No Standard Developed	53.53	25867
OR-5-02	% Flow Through - Simple	No Standard Developed	54.16	25566
OR-5-03	% Flow Through Achieved	95%	UD	
	OR-6 - Order Accuracy			
OR-6-01	% Accuracy - Orders	95% Orders without Errors	58.44	397
OR-6-02	% Accuracy – Opportunities	95% Orders without Errors	86.86	8981
OR-6-03	% Accuracy – LSRC	95% Orders without Errors	90.24	379
	Special Services - Electronically Submitted			
	OR-1 - Order Confirmation Timeliness			
OR-1-03	Average LSRC Time < 10 Lines		16.14	
OR-1-03	Average ASRC Time < 10 Lines DS0		UD	
OR-1-03	Average ASRC Time < 10 Lines DS1		UD	
OR-1-03	Average ASRC Time < 10 Lines DS3		UD	
OR-1-04	% On Time LSRC < 10 Lines	95% within 48 Hours	97.73	265
OR-1-04	% On Time ASRC < 10 Lines DS0	95% within 48 Hours	UD	
OR-1-04	% On Time ASRC < 10 Lines DS1	95% within 48 Hours	UD	
OR-1-04	% On Time ASRC < 10 Lines DS3	95% within 48 Hours	UD	
OR-1-05	Average LSRC Time >= 10 Lines		27.95	
OR-1-05	Average ASRC Time >= 10 Lines DS0		UD	
OR-1-05	Average ASRC Time >= 10 Lines DS1		UD	
OR-1-05	Average ASRC Time >= 10 Lines DS3		UD	
OR-1-06	% On Time LSRC >= 10 Lines	95% within 72 Hours	100.00	9
OR-1-06	% On Time ASRC >= 10 Lines DS0	95% within 72 Hours	UD	
OR-1-06	% On Time ASRC >= 10 Lines DS1	95% within 72 Hours	UD	
OR-1-06	% On Time ASRC >= 10 Lines DS3	95% within 72 Hours	UD	
	OR-2 - Reject Timeliness			
OR-2-03	Average LSR Reject Time < 10 Lines		11.09	
OR-2-04	% On Time LSR Reject < 10 Lines	95% within 48 Hours	100.00	8
OR-2-05	Average LSR Reject Time >= 10 Lines		3.36	
OR-2-06	% On Time LSR Reject >= 10 Lines	95% within 72 Hours	100.00	1

Legend Notations defined on Legend sheet - last page

Carrier to Carrier
Performance Standards and Reports
Interim Guidelines February 2000
Bell Atlantic - New York State

CLEC Aggregate Performance
ORDERING - UNE POTS / SPECIAL SERVICES

UNE Pre-ordering

Metric #		Standard	CLEC Aggregate Performance	CLEC Aggregate Observations
	PO-3 - Contact Center Availability			
PO-3-01	Average Speed of Answering – Ordering		21.65	
PO-3-02	% Answered within 30 Seconds – Ordering	80% within 30 Seconds	85.07	19007
PO-3-03	Average Speed of Answering – Repair		43.07	
PO-3-04	% Answered within 30 Seconds – Repair	80% within 30 Seconds	63.68	79551

Platform

Metric #		Standard	CLEC Aggregate Performance	CLEC Aggregate Observations
	OR-1 - Order Confirmation Timeliness			
OR-1-01	Average Local Service Request Confirmation (LSRC) Time (Flow-Through)		4.63	
OR-1-02	% On Time LSRC – Flow Through	95% within 2 Hours	89.80	150869
OR-1-03	Average LSRC Time < 10 Lines		11.65	
OR-1-04	% On Time LSRC < 10 Lines	95% within 24 Hours	97.02	49524
OR-1-05	Average LSRC Time >= 10 Lines		NA	
OR-1-06	% On Time LSRC >= 10 Lines	95% within 72 Hours	NA	
	OR-2 - Reject Timeliness			
OR-2-01	Average Local Service Request (LSR) Reject - Time (Flow-Through)		3.39	
OR-2-02	% On Time LSR Reject – Flow Through	95% within 2 Hours	91.50	20838
OR-2-03	Average LSR Reject Time < 10 Lines		10.35	
OR-2-04	% On Time LSR Reject < 10 Lines	95% within 24 Hours	97.33	21456
OR-2-05	Average LSR Reject Time >= 10 Lines		NA	
OR-2-06	% On Time LSR Reject >= 10 Lines	95% within 72 Hours	NA	
	OR-6 - Order Accuracy			
OR-6-01	% Accuracy - Orders	95% orders without errors	70.90	402
OR-6-02	% Accuracy – Opportunities	95% orders without errors	96.34	5840
OR-6-03	% Accuracy – LSRC	95% orders without errors	93.81	339

Loop/Pre-qualified Complex/LNP

Metric #		Standard	CLEC Aggregate Performance	CLEC Aggregate Observations
	OR-1 - Order Confirmation Timeliness			
OR-1-01	Average Local Service Request Confirmation (LSRC) Time (Flow-Through)		0.37	
OR-1-02	% On Time LSRC – Flow Through	95% within 2 Hours	93.22	6985
OR-1-03	Average LSRC Time < 10 Lines		11.69	
OR-1-04	% On Time LSRC < 10 Lines	95% within 24 Hours	90.91	9515
OR-1-05	Average LSRC Time >= 10 Lines		19.99	
OR-1-06	% On Time LSRC >= 10 Lines	95% within 72 Hours	96.37	745
	OR-2 - Reject Timeliness			
OR-2-01	Average Local Service Request (LSR) Reject - Time (Flow-Through)		0.21	
OR-2-02	% On Time LSR Reject – Flow Through	95% within 2 Hours	95.45	2905
OR-2-03	Average LSR Reject Time < 10 Lines		15.15	
OR-2-04	% On Time LSR Reject < 10 Lines	95% within 24 Hours	85.25	3275
OR-2-05	Average LSR Reject Time >= 10 Lines		16.73	
OR-2-06	% On Time LSR Reject >= 10 Lines	95% within 72 Hours	99.18	370
	OR-6 - Order Accuracy			
OR-6-01	% Accuracy - Orders	95% orders without errors	68.60	328
OR-6-02	% Accuracy – Opportunities	95% orders without errors	95.63	3316
OR-6-03	% Accuracy – LSRC	95% orders without errors	98.64	417

Complex Services - Electronically Submitted

Metric #		Standard	CLEC Aggregate Performance	CLEC Aggregate Observations
	OR-1 - Order Confirmation Timeliness			
OR-1-03	Average LSRC Time < 10 Lines		22.90	
OR-1-04	% On Time LSRC < 10 Lines (Electronic)	95% within 72 Hours	94.31	7459
OR-1-05	Average LSRC Time >= 10 Lines		NA	
OR-1-06	% On Time LSRC >= 10 Lines	95% within 72 Hours	NA	
	OR-2 - Reject Timeliness			
OR-2-03	Average LSR Reject Time < 10 Lines		18.75	
OR-2-04	% On Time LSR Reject < 10 Lines	95% within 72 Hours	94.96	2842
OR-2-05	Average LSR Reject Time >= 10 Lines		NA	
OR-2-06	% On Time LSR Reject >= 10 Lines	95% within 72 Hours	NA	

POTS / Special Services - Aggregate

Metric #		Standard	CLEC Aggregate Performance	CLEC Aggregate Observations
	OR-3 - Percent Rejects			
OR-3-01	% Rejects	No Standard	22.32	258449
	OR-4 - Timeliness of Completion Notification			
OR-4-01	Completion Notice – Average Response Time		0.04	
OR-4-02	Completion Notice – % On Time	95% by next bus. day at noon	98.38	191597
OR-4-03	% Orders Excluded from % On Time Measurement	95% by next bus. day at noon	UD	
OR-4-04	Work Completion Notice – Average Response Time		0.00	
OR-4-05	Work Completion Notice – % On Time	95% by next bus. day at noon	99.99	199821
	OR-5 - Percent Flow-Through			
OR-5-01	% Flow Through - Total	No Standard Developed	70.12	225098
OR-5-02	% Flow Through - Simple	No Standard Developed	72.53	217638
OR-5-03	% Flow Through Achieved	95%	UD	

continued

ATTACHMENT 13

Examples of Post-271 Hearing Attention to the Manual Reject Notification Issue and to SWBT's Failure to Improve Upfront Edit Capability

Date	Docket & Pleading/Transcript	Reference
07/13/98	TPUC Project 16251, AT&T's First Response to SWBT's Initial Filing in the Collaborative Process, p. 38	AT&T calls attention to SWBT's inability to create and return electronic reject notifications for errors detected beyond LASR. AT&T proposes "that the collaborative process might include a schedule to move edits from SORD and CRIS forward into LASR." (p. 38 & n.22) AT&T notes that SWBT's inability to generate an electronic reject notification impacts SWBT's ability to meet Commission OSS Specific Recommendations Nos. 6, 7, 12, 18, 20, and 21.
08/27/98	TPUC Project 16251, Workshop Session, pp. 527 –536	Summary of discussion about SWBT's plans to move SORD edits to LASR. SWBT indicates that it is increasing the number of SORD edits being moved to LASR in what will be "a continuous process." (pp. 527, 531). AT&T expresses concern that no understanding has been communicated about what is left to be done in the process of moving edits to LASR and that its interest is in real time return of reject notifications. (p. 535)
11/11/98	TPUC Docket 19000, Transcript, pp. 61-62	In discussion of where process stands in improving up front edit programming so that edits are moved upfront earlier in its systems, SWBT acknowledges that "We're not there yet."
11/12/98	TPUC Project 16251, AT&T Letter to ALJ	AT&T reurged request that SWBT be required to provide list of edits that have not been moved up from SORD to LASR and that are resolvable through submission on an LSR.
11/18/98	TPUC Project 16251, Final Staff Status Report	On each recommendation raising issues regarding electronic reject notifications, the Report indicates that verification must be obtained in 3rd party testing. "As recognized by the FCC in the Second BellSouth decision, an OSS system is deficient if it fails to electronically return error messages but instead relies too heavily upon the BOC to manually re-key orders that have fallen out of the system. Third-party testing should provide adequate data to analyze whether it relies too heavily upon manual processes. SWBT shall also agree to provide training data for CLECs concerning the kinds of errors

Date	Docket & Pleading/Transcript	Reference
		that are falling out of the SORD." (p. 186)
12/10/98	TPUC Project 16251, AT&T Dalton Aff. ND-6.	"[I]f an electronic CLEC order contains an error that is not detected until the order has successfully passed up-front edits and been delivered to SORD, SWBT does not have the systems capability in place today to generate and return an electronic reject notification, again resulting in manual intervention."
12/10/98	TPUC Project 16251, AT&T Dalton Aff. ND-20	"SWBT has not completed the process to move forward to LASR those edits that currently reside only in SORD (where the detection of an error addressable by resubmission of an LSR will result in manual intervention and non-electronic generation of reject notifications). SWBT plans to improve the return of electronic reject and generation of electronic jeopardy notifications have not yet been implemented."
12/10/98	TPUC Project 16251, AT&T Dalton Aff. ND-22	"[N]or have CLECs been provided with any data to perform a root cause analysis of what is causing CLEC orders to reject and how the opportunities for a CLEC order to reject compare to those potential pitfalls that confront SWBT's retail operation in the submission of orders designed to deliver the same or similar customer services."
12/10/98	TPUC Project 16251, AT&T Dalton Aff. ND-40	"At this stage, too little is known about the likely frequency of fall out at SORD and beyond and the extent of manual processing associated with the fall out. AT&T does not believe the proposed manual creation of a reject notification, which is then returned electronically to the CLEC, is an adequate answer because the clerk's creation of the manual error notification introduces opportunities for delay and error. Other than having a window-dressing appearance of mechanization, the interim step SWBT plans to introduce in first quarter 1999 (while arguably better than a facsimile notification) does nothing to quiet the concerns voiced by the FCC regarding manual intervention and potential for error and delay."
12/10/98	TPUC Project 16251, AT&T Dalton Aff. ND-42	"SWBT has made claims that it is gathering data to allow a trending on CLEC order rejection rates and their root causes (a process that SWBT said it had initiated shortly before commencement

Date	Docket & Pleading/Transcript	Reference
		of the 271 hearings), yet the collaborative process has not yet benefited from the sharing of *any* such data on electronic ordering. Indeed, SWBT has expressed doubts in OSS work sessions as to its ability to distinguish from a data reporting standpoint between CLEC-caused and SWBT-attributable order fall out. Similarly, business-to-business communications have not resulted in the delivery of comprehensive order rejection data, even on orders sent via EASE. (*See* AT&T handout on rejection and flow-through, distributed at the 10/13/98 OSS work session, Attachment 66 to the Affidavit of Michelle Bourianoff)."
12/21/98	TPUC Project 16251 & 19000, Open Meeting, pp. 2670-71	Commitment is obtained from SWBT to provide AT&T with its SORD edits list. SWBT later explains that commitment to provide list of remaining edits in SORD meant only that it would provide list of 56 edits slated to be moved to the LASR GUI. (1/14/99, TPUC 19000 Phone Conference, pp. 68-69)
01/14/99	TPUC Docket 19000, Telephone Conf., pp. 65-77	AT&T restates its longstanding request for a list of SORD edits. SWBT opposes the request and states "we do not have a time frame scheduled for movement of these edits yet. . . . We've got a lot of things on our plate with regard to getting stuff programmed and ready to go." AT&T notes that requests for the SORD edits list had been outstanding since at least August 1998.
01/25/99	TPUC Docket 19000, Telephone Conf., pp. 56-81	In response to AT&T's concern that it be permitted to participate in an analysis of what edits have not been and should be moved upfront, SWBT indicates that nothing in the FCC rule or the FTA "give[s] AT&T a role in that design process, which is what is being sought here." (p. 69). SWBT's position is that "I don't think we should be expending resource around trying to further mechanization of the non-fatal process." (p. 56) SWBT insists that looking at fall out in future testing and operational ordering is the only way to approach deciding which further edits to move upfront. (p. 71) AT&T indicates that the precise issue it is trying to avoid is finding "a land mine in our production

Jeopardy Description	December	January	February	March
Assignment Problems	2		5	15
Account Already Converted*		8	102	116
Account Not Eligible for Conversion*		3	23	31
Busy Cable & Channel Pair			1	2
Customer Not Ready	1	2	2	
Customer could not be rached at reach number			1	2
Duplicate LSR*		2	20	
Duplicate Circuit ID			1	17
EU Not Ready	7	24	47	30
End User name and TN Do Not Match*		1	19	9
Field Visit Determined Address Invalid	10	18	51	148
Frame Due Time Could Not Be Met			3	
Invalid CFA			1	
Invalid Due Date*		12	75	77
Invalid Feature		1	10	11
Invalid Feature Detail		2	8	8
Invalid TN*		22	140	64
No Access to EU Prem	7	12	23	11
No Loop Available			4	
Need to obtain Right of Way				1
Notification of New DD	19	31	24	22
NSP Missed Appt	1		14	36
Not Technically Feasible				4
Please Send SUPP to Cancel PON	9	11	13	14
Provide Driving Instructions			1	1
Requested DD is Less than Published Interval*		12	37	9
Scheduling and Workload	1			
Special Construction			3	
The Prem is not Ready	3	2	1	3
There No Facilities	21	22		144
There is no Access	1		70	4
Verify TN or Provide Driving Instructions*		21	149	182
TOTAL	82	206	848	961
* # of Jep's which are actually post FOC errors	0	81	565	488

ATTACHMENT 14

Date	Docket & Pleading/Transcript	Reference
		environment." (pp. 72-73) ALJ declines to order SWB to produce SORD edit list. (p. 77) SWBT indicates SORD list will not be produced voluntarily and will not, in any event, be helpful in determining candidates to move up to LASR.
02/17/99	TPUC Project 16251, AT&T Letter, to K. Farroba and H. Siegel from AT&T	AT&T again formally solicits assistance in requiring SWBT to provide system information. The letter notes that AT&T cannot make informed recommendations in the change management process as to which edits should be moved forward into LASR without information from SWBT as to what error conditions will cause a service order to fall out to manual processing. AT&T indicates a preference "for SWBT's systems development to be at a stage where the SORD list truly would have no meaning because all conditions that might cause an order to fall out to manual processing in SORD would be detectable in LASR, causing an electronic reject notification to be returned to the CLEC."
03/02/99	TPUC Project 16251, Letter from SWBT to TPUC, (SWBT FCC Application Appendix C, Vol. 99, Tab 1491)	SWBT refers to December 1998 Accessible Letter notification of its introduction of 56 SORD manual reject conditions that were "slated for movement to SWBT's LASR GUI interface and, ultimately, to LASR itself." [Note: SWBT has not completed moving even these 56 manual error conditions to LASR.]
03/02/99	TPUC Project 16251, SWBT Letter to K. Farroba and H. Siegel	SWBT states that even though SORD error messages will be accessible to CLECs once SORD is made generally available, that SWBT "is not proposing to engage in the types of analysis required for the various projects outlined in AT&T's February 17th letter."
03/26/99	TPUC Docket 20000, AT&T's Letter to Commissioners Regarding the OSS Testing, pp. 4-5	AT&T expresses concern that reject rates are not being reported for manual reject notifications. AT&T urges that manual and electronic error data be analyzed in the testing docket in conjunction with an analysis of current and historical flow through rates.
4/28/99	TPUC Project 20,400, Change Management Process Meeting Notes, 2/23 & 3/16/99 Meetings	Contains SWBT's 12-Month Development View slating implementation of additional edits for the 1st, 2nd & 3rd quarters of 1999. Minutes reflect that 8 edits are being targeted to be moved from non-fatal to fatal in the 5/1/99 Release, "in an effort

Date	Docket & Pleading/Transcript	Reference
		to meet CLEC requests to move edits up-front." [Note: See 2/4/00 entry, below, indicating the small number of fatal edits actually implemented in 1999.]
05/25/99	TPUC Docket 20000, AT&T Supplemental Comments on Master Test Plan	"Now that we have confirmation that manual intervention will be relied upon in processing CLEC electronic orders – even those that are MOG-eligible -- no justification exists for artificially limiting test cases. Yet, the Test Plan continues to exclude from capacity testing any order that has not been proven in advance to process without manual intervention. In addition, the test cases used for capacity testing unrealistically exclude orders that contain errors leading to manual rather than electronic rejection." "Despite widespread recognition that parity is a critical standard in OSS functionality, the Test Plan fails to describe or detail the processes being employed to compare functionality available to SWBT's retail operations compared with functionality available to CLECs. For example, while CLEC orders that fail an edit in SORD (or encounter a non-fatal error in MOG) fall out to manual handling and a manual return of reject notification, SWBT's EASE retail operation has available 'on screen' edit capability and SORD Edits – a function which causes error messages from SORD to be returned electronically on EASE orders. Is Bellcore conducting any substantive review of how the process of returning rejects differs between SWBT's retail environment and the CLEC environment? 'Third-party testing should provide adequate data to analyze whether SWBT's method of handling order rejections is at parity with its EASE system or whether it relies too heavily upon manual processes.' FSR at 186 (Rec. 12); see also FSR at 198 (Rec. 20); FSR at 199 (Rec. 21). Despite this clear directive, the Test Plan fails to state a commitment to make the required parity analysis of reject and reject notification processes."
07/26/99	TPUC Docket 20000, Telephone Conf., p. 184	Telcordia was asked what review was done of the SORD EDITS function available in conjunction with SWBT's

Date	Docket & Pleading/Transcript	Reference
		EASE interface for the receipt of electronic reject notifications from errors detected in SORD. Telcordia acknowledges not having done a detailed review of SORD EDITS functioning in conjunction with EASE interface.
08/02/99	AT&T Comments on Telcordia's Interim Results, p. 11	"More than one third of the rejects received during the UNE-P testing were generated and returned manually (i.e. via fax). And at least 34 percent of manual rejects during the UNE-P testing were received outside of five hours after the LSR was submitted. Phone Conference, Tr. at 200, 204 (7/26/99) (J. Nix). The impact of SWBT's over reliance on manually generated records on the accuracy and timeliness of order processing and provisioning will be enormous. ... Telcordia did not conduct a parity review to determine whether the ability to generate electronic error messages in SWBT's retail environment is superior to the electronically generated error message return available to CLECs."
10/13/99	TPUC Project 20000, AT&T Comments on Telcordia Final Report, pp. 25-26	"Given the number of Texas PUC OSS recommendations relating to rejects and parity flow through, AT&T had expected that the Final Report would include a thorough analysis of the differences and similarities between the retail and wholesale methods of returning error notifications. The Final Report, however, contains no discussion of the screen edit capability of EASE or the SORD EDITs capability by which SORD errors are returned electronically in SWBT's retail environment. Similarly the Final Report makes no comparison of whether each of the screen edits in EASE (that prevent a retail service representative from even advancing screen to screen if an order entry error occurs), are now resident in LASR, so that at least those error conditions can give rise to electronically-generated, not just electronically-returned, error messages. Because of the number and content fields SWBT requires be included on an LSR EDI file, AT&T believes that CLECs need reject notification from SWBT systems that ensures timely and accurate error messages, a goal achieved best by

Date	Docket & Pleading/Transcript	Reference
		electronically generated and returned error records. . . . Similarly, AT&T has been unable to locate in the Final Report a comprehensive discussion of the impact on a CLEC's operations from the potential for delay and error introduced by manually-created rejection notifications. Moreover, the number of instances in which the root cause is identified as service representative error in incorrectly rejecting or failing to reject an LSR signals that more work is needed in automating the error detection and return process. See, e.g., OR-2, OR-5, OR-6, OR-7, OR-8, OR-9
11/02/99	TPUC Project 16251, AT&T Comments on BANY DOJ Evaluation, p. 10	"SWBT's operations reflect a similarly high overall reject rates in September of 27.5% (adding together rejects captured under PM 9 and PM 10.1). While reject rates are not available for UNE-P (because SWBT has failed to disaggregated PM 13 as required by the business rule), SWBT data shows high percentage of manual rejects of electronic orders (8% – 14% of total LSRs from July through September (PMS 9, 10.1 and 11.1). In the Telcordia OSS testing, the total reject rate was 48% and the level of manual rejects was 24%. (*See* SWBT's Force Model Summaries and Scenarios, p. 7, filed 10/28/99)."
02/04/00	FCC Docket No. 00-4, SBC Ex Parte Letter from A. Schlick to M. Salas	SWBT acknowledges that only 27 edits were added as either LASR or MOG fatal errors in the last year.